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To: FCC Localism Task Force

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RE: Comments for MB Docket No. 04-233

What follows is a written and slightly expanded version of my oral comments delivered to the FCC Localism Task Force hearing in Monterrey, CA on July 21, 2004.

Madame and Sir Commissioners,

My dissertation research centers on the phenomenon of Low Power FM and its impact on local communities. For over two years I have conducted an in-depth study of one of the first LPFM stations in California, KRBS in Oroville.

In recent years, political scientists and sociologists, as well as national editorialists, have lamented the decline in civic participation and engagement in our society. Theories explaining this trend center on the pervasive cynicism present throughout society; cynicism that people's voices are not heard and that their votes don't matter.

In my years researching KRBS, and in scores of interviews with LPFM groups across the country, I have found quite the opposite. Through their participation in community-oriented radio stations, they overwhelmingly report a feeling of *connectivity* – both to each other and to wider social forces and currents previously unexperienced. In turn I have observed an increase in civic engagement and participation. In Oroville, a community of politically progressive residents has emerged in what they perceive to be a sea of “red” neighbors – Eastern California is predominantly a politically and socially conservative place. But their story is more interesting than just that.

This band of progressives has embarked upon a seemingly impossible task: to provide access to a broad array of its community voices, not just its own progressive ones. Over 50 volunteer programmers reflect the diversity and concentration of a unique regional artistic culture. Through underwriting agreements with local businesses, they are making inroads into bringing life and business back into its historic downtown, long suffering due to the strip mall and subsequent box-store development that marked Oroville's development strategy of the last decade. On KRBS's airwaves one can hear from a variety of political perspectives, obtain sources of information unavailable to most county residents, and listen in to a host of cultural programs ranging from folk and bluegrass to the traditional music of the sizeable Hmong population in the area. Other Hmong-language programs serve the Hmong people of Oroville with a valuable source of information about education and social services.

Many of the KRBS volunteers have been inspired by how reconnected to their community they now feel. As a result many have either joined, or rejoined, various community and civic organizations around the county, volunteering their time to local cultural or social services. Some have engaged in campaigns to place county-level

initiatives on the electoral ballot. In a predominantly poor county there are certainly many initiatives that are needed, and the experience of KRBS suggests more are sure to follow in years to come.

While my data is rich at this local level of a single station, my research also suggests that KRBS is not an isolated case. More research should certainly be conducted on the hundreds of other LPFMs that have sprung up across the country – religious and secular, politically charged and decidedly objective – to understand the myriad ways in which true localism in broadcasting can be mutually reinforcing to both radio, and to the communities in which radio stations exist. A strong and vibrant local media is essential to fostering strong and vibrant local communities.

The lesson is that LPFM is playing a strong role in civic renewal. Being connected to one's community should not be limited exclusively to the opportunity for a new LPFM license window to open, however. While I suggest strongly that such windows do open, the lesson of LPFM offers us insight into the merits of other mechanisms to stimulate local civic renewal through participation in radio or other communications media.

One easy step would be to strengthen the criteria through which incumbent broadcasters demonstrate a commitment to localism in their local media outlets. If larger broadcasters were encouraged to allow a portion of their daily or weekly program grids to be open to public participation by community groups or associations, even more groups and organizations could participate in their local communications media and increase the likelihood that civic participation will rise as a result. I could think of few stronger demonstrations of a commercial station's commitment to its local community than to welcome that community into its program grid on a regular basis at hours appropriate to maximum listenership.

This proposal need not be mandated in specific content; rather it should be suggested in the broadest terms so as to allow individual local broadcast outlets the opportunity to creatively implement the idea according to local needs specific to each of our treasured communities. I submit that such efforts, where deemed to be genuine, should count strongly towards a stations' demonstration of commitment to its local public interest. These efforts could be reviewed by local constituents as well as FCC staff to evaluate a stations' contribution to localism in broadcasting during license renewal periods, for example.

Whether showcasing local artistic talent or opening a space for debate and conversation on important local issues, creating community time on existing full power stations – and enforcing public interest obligations more generally – should be a central focus of this Task Force. Airing canned public service announcements at 3AM is one thing. Inspiring entire communities to become more involved, more connected, more aware, and less cynical about civic participation should be amongst the top priorities when evaluating commitments to public interest obligations for broadcasters.

So yes, let's open filing windows for more LPFMs, especially in urban areas now that the 3<sup>rd</sup> adjacent channel protections have been proven by the MITRE report to be unnecessarily strict. But let's also open existing stations' airwaves to local community voices on a regular basis, and let's let *that* count as serving the public interest – something that all broadcast licensees are required to do.

Thank you for your time and attention on this important matter.

J. Zach Schiller  
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